

Exhibit B

From: Brown, Nancy A <BrownN@SEC.GOV>
Sent: Tuesday, December 5, 2017 4:36 PM
To: Matthew L. Schwartz
Cc: Shah, Tejal
Subject: RE: SEC v Archer

Matt,

Our IT staff estimates that a hard drive of at least 1.5 terabytes should accommodate a production of the Intel emails.

From: Matthew L. Schwartz [mailto:mlschwartz@BSFLLP.com]
Sent: Monday, December 04, 2017 4:53 PM
To: Brown, Nancy A; David Nelson
Cc: Shah, Tejal
Subject: RE: SEC v Archer

OK. What size would we need for the Intel emails?

From: Brown, Nancy A [mailto:BrownN@SEC.GOV]
Sent: Monday, December 4, 2017 4:30 PM
To: Matthew L. Schwartz; David Nelson
Cc: Shah, Tejal
Subject: RE: SEC v Archer

As we've discussed, I can tell you what size hard drive you'd need for the Intel emails, but for the other material, your IT vendor will have to work with our IT people to figure out logistics for imaging of the various media we have. The 40 or so boxes of documents are not digitized, so we will have to arrange either their copying or some time for you to come review them in our offices.

Let me know how you'd like to proceed.

From: Matthew L. Schwartz [mailto:mlschwartz@BSFLLP.com]
Sent: Monday, December 04, 2017 4:26 PM
To: Brown, Nancy A; David Nelson
Cc: Shah, Tejal
Subject: RE: SEC v Archer

What size drive would I need to give you to get the "AAM Materials"?

From: Brown, Nancy A [mailto:BrownN@SEC.GOV]
Sent: Monday, December 4, 2017 4:13 PM
To: Matthew L. Schwartz; David Nelson
Cc: Shah, Tejal
Subject: RE: SEC v Archer

Matt,

That is correct. The production will not include those materials. As we've discussed, we will not divulge what we have shared with the USAO.

Thank you.

From: Matthew L. Schwartz [<mailto:mlschwartz@BSFLLP.com>]
Sent: Monday, December 04, 2017 11:48 AM
To: Brown, Nancy A; David Nelson
Cc: Shah, Tejal
Subject: RE: SEC v Archer

Nancy –

With respect to the “AAM materials,” I assume you are referring to the materials described in your November 27 e-mail to me as:

- Approximately 40 boxes of documents stored by AAM Alexandria and Stamford offices
- Servers, back up tapes collected from AAM by Receiver from AAM offices in Alexandria and Stamford
- Assorted materials collected by Receiver from AAM Alexandria and Stamford offices. Includes selected documents obtained by Receiver; additional hard drives from Alexandria and Kansas City (old); back up external harddrive of Stamford server; Daniel Turney’s back up external harddrive from Alexandria; keys, id cards and employee phones (excluding Morton’s); Hughes 2013 tax return; Service providers contracts; quick books data
- Emails from Intel (ISP for AAM Stamford).
- Quickbooks for AAM
- 55 Desktop harddrives; 7 laptops and 10 other devices

We asked you whether this was information that had previously been produced to us by the USAO. You instructed me to ask that question of the USAO, as you were not in a position to tell us what they had produced. However, the USAO has now refused to answer the question, on the theory that doing so would somehow reveal its “litigation strategy.” Can you tell me whether the above is information that the SEC has previously shared with the USAO? As you know, all I am trying to do for present purposes is figure out whether that material is stuff we already have, or whether it’s unique. Thanks.

-mls

Matthew L. Schwartz
BOIES SCHILLER FLEXNER LLP
212-303-3646 (Direct)
646-337-5787 (Mobile)

From: Brown, Nancy A [<mailto:BrownN@SEC.GOV>]
Sent: Monday, December 4, 2017 11:09 AM
To: Matthew L. Schwartz; David Nelson
Cc: Shah, Tejal
Subject: SEC v Archer

Matt and Dave,

Please provide an 80GB hard drive for our further production. As we’ve discussed, it will not include the AAM materials we have previously offered and described to you. Thank you.

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